

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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RANDOLPH W. KEUCH <div style="text-align: right; padding-right: 20px;">Plaintiff,</div> <div style="text-align: center; padding: 5px 0;">v.</div> TEVA PHARMACEUTICALS USA, INC., And TEVA PHARMACEUTICAL INDUSTRIES, Ltd., <div style="text-align: right; padding-right: 20px;">Defendants.</div>	: : : : : : : : : :	CIVIL ACTION  CASE NO. 2:19-CV-05488 (JMG)
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**JOINT APPENDIX**

**Index of Items in Joint Appendix**

**A. Non-Bates Labeled Pleadings and Documents**

<b>Document Name</b>	<b>Joint Appx Bates Range</b>
Docket Entries	0360-0366
Amended Complaint	0370-0387
Defendant TEVA Pharmaceuticals USA, Ins. Answer to Plaintiff's Amended Complaint	0388-0403
Defendant TEVA Pharmaceutical Industries, LTD Answer to Plaintiff's Amended Complaint	0404-0420
Memorandum Opinion-Middlebrooks v. TEVA	0421-0439
Sworn Affidavit of Plaintiff Randolph W. Keuch	1264-1276

**B. Written Discovery Requests and Responses**

<b>Document Name</b>	<b>Discovery Bates Range</b>	<b>Joint Appx Bates Range</b>
Defendants First Set of Document Requests to Plaintiff Regarding Plaintiff Randolph Keuch		0001-14
Defendant First Set of Interrogatories to Plaintiff Regarding Plaintiff Randolph Keuch		0015-31
Plaintiff's Answers to Defendants' First set of Interrogatories		0032-42
January 11, 2022 Letter to Alan B. Epstein regarding Discovery Deficiencies		0043-47
March 8, 2022 Response Email from Alan B. Epstein regarding Discovery Deficiencies		0048-50

**C. TEVA Bates Labeled Documents**

<b>Document Name</b>	<b>Discovery Bates Range</b>	<b>Joint Appx Bates Range</b>
Keuch Employment Application	TEVA000035 -42	0051-58
Keuch Offer Letter	TEVA000047-49	0059-61
TUSA Employee Proprietary Information and Inventions Agreement	TEVA000069-73	0062-66
Mark Sabag Update Email	TEVA000113-115	0067-69
Keuch Dec. 20, 2017 Email and Attachments	TEVA000116-143	0070-97
Keuch Dec. 14, 2017 Email and Attachments	TEVA000144-171	0098-125
Keuch Unsigned Separation Agreement	TEVA000172-188	0126-142
Teva Announcement Dec. 14, 2017	TEVA000242-245	0143-146
Teva PPT Dec. 14, 2017 Announcement	TEVA000246-258	0147-159
Teva Code of Conduct	TEVA000518-561	0160-0203
Dec. 21, 2017 Email Chain	TEVA000608-609	0204-205
Topics for Ron	TEVA000748	0206
Vitman Email	TEVA000768	0207
Asaaf Email	TEVA000781-782	0208-209
Eduardo Nasi Pay Increase	TEVA000853	0210
Keuch Performance Documents	TEVA 000001-31	0440-0470
Americas Total Rewards Team Operational Review-June 2017	TEVA 000120-144	0471-0495
Question and Answer Session	TEVA 000258-274	0496-0512
Americas Town Hall, December 14, 2017	TEVA 000196-212	0513-0529
Proposed Headcount Reduction for the North America R Team December 15, 2017	TEVA 000145-171	0530-0556
NA Human Resources Final L3 Org Structure	TEVA 000231-36	0557-0562
TEVA Relocation Policy	TEVA 000057-66	0563-0572
TEVA Harassment Discrimination and Retaliation Prevention and Reporting Policy	TEVA 000189-191	0573-0575

**D. KEUCH Bates Labeled Documents**

<b>Document Name</b>	<b>Discovery Bates Range</b>	<b>Joint Appx Bates Range</b>
Zorman Update	KEUCH000009-10	0211-0212
Org Chart	KEUCH000017	0213
Keuch Salary Increase	KEUCH000024	0214
Keuch Retention Bonus	KEUCH000028-29	0215-216
Keuch Dec 14, 2017 Email and Attachments	KEUCH000050-78	0217-245
Keuch Dec. 20, 217 Email Chain	KEUCH000079	0246
Keuch Unsigned Separation Agreement with all Attachments	KEUCH000135-163	0247-267

Keuch Separation Notification and Benefits Summary	KEUCH000183-184	0268-269
Departing Employee Checklist	KEUCH000251-252	0270-271
Keuch Email with L. Billow	KEUCH000388-389	0272-273
Weinstein Pay Summary	KEUCH000514	0274
Notice of Right to Sue	KEUCH000812-813	0576-0577
R. Keuch Job Offer Letter	KEUCH000132-133	0578-0579
Base Salary Increase and Retention Bonus Memo	KEUCH000028-29	0580-0581
8/6/2015 Base Salary Increase and Retention Bonus Memo	KEUCH000028	0580
5/26/2016 Base Salary Raise Memo	KEUCH000024	0582
August 23, 2017 Congratulatory Letter from TEVA CPA re: IRS Adjustment Finding	KEUCH000023	0583
Keuch Bonus Payout Memo 2017	KEUCH000016	0584
September 2016 \$23,800 Award to R. Keuch from Mark Sabag	KEUCH000025	0585
9/27/2017 and 9/28/2017 Email Chain, R. Yaniv and M. Sabag	KEUCH000080	0586
TEVA Qualifying Retirement Rules for Equity Treatment	KEUCH000114-127	5087-0600
Email Chain, March 26, 2016 re: 409A Considerations	KEUCH000109-113	0601-0605
November-December 2016 Email Chain re: 409A Retirement Eligibility	KEUCH000090-108	0606-0624
March 2017 Email Chain re: Equity Treatment on Retirement	KEUCH000080	0586
August 2017 Email Chain re: Retirement Vesting Rule	KEUCH000084-85	0629-0630
Letter from Keuch to Employee re: Qualified Retirement Treatment for Unvested Equity Award Taxation	KEUCH000011-13	0634-0636
R. Keuch CV	KEUCH000038-41	0638-0640
10/3/2017 Mark Sabag Email re: Retention Concerns	KEUCH000128-129	0644-0645
Email Chain 12/14/2017 and 12/15/2017 Between R. Keuch and T. Zorman	KEUCH000050	0646
Exhibit C to Keuch Proposed Settlement Agreement re: Ages of Terminated and Retained Employees	KEUCH000159-163	0649-0653
Warn Act Notification	KEUCH000219	0655
News Article re: TEVA Move to North Jersey	KEUCH000378	0656
TEVA Pharmaceutical Industries Ltd. SEC 10-K Filing, December 31, 2017	KEUCH000291-334	0658-0701

Law 360 News Release re: \$6.2 Million Bias Verdict Against TEVA US	KEUCH000341	0702
Memorandum Opinion, Brian McManus v. TEVA	KEUCH000361-377	0704-0720

**E. Defendant's Deposition Transcript Excerpts**

Document Name	Discovery Bates Range	Joint Appx Bates Range
Tal Zorman Deposition Transcript Excerpts		0275-299
Mark Sabag Deposition Transcript Excerpts		0300-308
Daniel Lawlor Deposition Transcript Excerpts		0309-313
Randolph Keuch Deposition Transcript Excerpts		0314-346
Eduardo Nasi Deposition Transcript Excerpts		0347-359

**F. Plaintiff's Deposition Transcript Excerpts**

Document Name	Page Numbers	Joint Appx Bates
Deposition of Eduardo Nasi	Cover Sheet, 5, 7, 12-15, 19-21, 26-27, 42-43, 47-49, 51-54, 61-63, 72, 74-76, 79	1148-1163
Deposition of Mark Sabag	Cover Sheet, 4, 16, 22-23, 34-37, 39	1164-1169
Deposition of Tal Zorman	Cover Sheet, 12, 26, 29-33, 41-42, 45-50, 53-56, 62, 67-69, 79-80, 82-83, 92-93	1170-1183
Deposition of Daniel Lawler	Cover Sheet, 9-10, 12, 17-19, 23-36, 38-40, 43-44, 48-49, 52-53, 61-63	1184-1198
Deposition of Elaine McGee	Cover Sheet, 18-19, 22, 24-26, 27-28	1199-1202
Deposition of Randolph W. Keuch	Cover Sheet, 2-238	1203-1263

**G. Additional Documents**

Document Name	Discovery Bates Range	Joint Appx Bates Range
Amended 2017 10-K		0778-1057
7/27/22 TEVA 10-Q Filing		1058-1147